

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

JOHNNY M. HUNT,

Plaintiff,

v.

SOUTHERN BAPTIST CONVENTION;
GUIDEPOST SOLUTIONS LLC; and
EXECUTIVE COMMITTEE OF THE
SOUTHERN BAPTIST CONVENTION,

Defendants.

Case No. 3:23-cv-00243
Judge Campbell
Magistrate Judge Frensley

**DECLARATION OF
SAMANTHA KILPATRICK
IN OPPOSITION TO THIRD PARTY
WITNESS ROY BLANKENSHIP'S
MOTION TO QUASH AND FOR A
PROTECTIVE ORDER**

Samantha Kilpatrick declares under penalty of perjury under 28 U.S.C. § 1746 that the following is true and correct:

I, Samantha Kilpatrick, submit this Declaration in support of Guidepost Solutions LLC's ("Guidepost") Response in Opposition to the motion by third-party witness Roy Blankenship ("Blankenship") to quash Guidepost's subpoena for testimony and documents and for a protective order and hereby state, aver, and declare the following:

1. I am a Senior Managing Director of Guidepost. I participated in Guidepost's independent investigation into allegations concerning (1) sexual abuse by members of the Executive Committee ("EC") of the Southern Baptist Convention ("SBC"); (2) the EC's mishandling of sexual abuse allegations; (3) the EC's mistreatment of sexual abuse victims; (4) patterns of intimidation of sexual abuse victims or advocates; and (5) resistance to sexual abuse reform initiatives by the SBC.

2. As stated in the Complaint in this action, Guidepost conducted the investigation pursuant to its engagement letter with the SBC (the "Engagement Letter") by obtaining and

reviewing documents and conducting witness interviews. At the end of the investigation, Guidepost prepared and submitted a written report to the SBC Task Force (the “Report”).

3. After Guidepost was contacted about the account of a woman who claimed to have been assaulted by Plaintiff Johnny Hunt (“Hunt”) in July 2010, another Guidepost investigator, Russell Holske, and I conducted a series of witness interviews, including interviews of the woman, her husband, Hunt, and Blankenship, among others.

4. Our notes of the various witness interviews were used in preparation of that part of the final Report that concerned the accusations against Hunt. Relevant portions of the Report that relate specifically to Hunt’s alleged sexual assault and Blankenship’s subsequent role as a marriage counselor to the couple are attached as Exhibit 1 to this Declaration.

5. As stated in the Report, the husband furnished Mr. Holske with several pieces of evidence on a Passport hard drive to corroborate his and his wife’s accusations against Hunt, including an electronic journal and several audio files. We were informed that the audio files contained recordings of marriage counseling sessions where Blankenship and the couple were present. The husband supplied us with a written consent to access the contents of the Passport drive in aid of the investigation. A true copy of the consent form is attached as Exhibit 2 to this Declaration.

6. We were informed that, as stated in the Report, Guidepost confirmed forensically that the data on the hard drive was in fact created in 2009-2011, which corroborates the counseling relationship between Mr. Blankenship and the couple.

7. In connection with our investigation, we also determined that Blankenship was not a licensed marriage counselor at the time of the incident in 2010.

8. Russell Holske and I met with Blankenship in person at his office in Kennesaw, Georgia, on May 9, 2022. Blankenship was initially uneasy about speaking with us, but he said he was willing to answer yes or no questions. During questioning, at times he provided more than a yes or no answer, and confirmed that he had met with Hunt and the couple at the same time, and on a later occasion with Hunt's wife as well, shortly after the alleged assault.

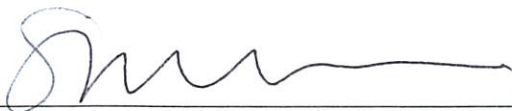
9. After we concluded our interview of Blankenship, Russell Holske and I prepared a written memorandum of the interview dated May 9, 2022, a true and correct copy of which is attached to this Declaration as Exhibit 3.

10. As stated above, following our investigation of the wife's account, our notes of the interview of Blankenship were incorporated in the final Guidepost Report.

11. The portions of the Report attached to this Declaration and our memorandum dated May 9, 2022, constitute a fair and correct account of our interview of Blankenship and of the statements made by him at the time.

12. I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 3, 2024, at Raleigh, North Carolina.



Samantha Kilpatrick

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served through the Court's electronic filing system on the following:

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Counsel for Third-Party Roy Blankenship

on this 4th day of January 2024.

s/John R. Jacobson